

EXHIBIT “C”

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

- - -

Gerardo Campos, et al.,	:	
	:	
Plaintiffs,	:	
	:	
vs.	:	Case No.
	:	3:12-cv-01529-ADC
Safety-Kleen Systems,	:	
Inc., et al.,	:	
	:	
Defendants.	:	

- - -

DEPOSITION OF PETER G. SHIELDS, M.D.

- - -

Friday, May 9, 2014
9:19 o'clock a.m.
Crabbe, Brown & James
500 South Front Street
Suite 1200
Columbus, Ohio 43215

- - -

ANN FORD
REGISTERED PROFESSIONAL REPORTER

- - -

**CERTIFIED
COPY**

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11 On behalf of the Plaintiffs.

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22 Systems, Inc. and Safety-Kleen
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On behalf of the Defendant Makita
U.S.A., Inc.

- - -

1 Q. Okay. Doctor, you'll agree that there are
2 studies that do statistically link Benzene exposure
3 to CML?

4 A. Rare studies.

5 Q. But you do agree there are studies that
6 support the plaintiff's position in this particular
7 case that Benzene can cause the CML that he has in
8 this particular case?

9 MR. COLÓN: Objection to form.

10 BY MR. ROBB:

11 Q. Right?

12 A. Among the dozens of studies that address
13 the question, there's maybe one or one-and-a-half
14 that will support their contention.

15 Q. And those are specifically relevant
16 studies, are they not?

17 A. Well --

18 MR. COLÓN: Objection as to form.

19 A. -- relevant is a different question.
20 The answer is no.

21 Q. They are statistically valid studies,
22 aren't they, Doctor?

23 MR. COLÓN: Same objection.

24 A. They're using acceptable statistical
25 analysis if that's what you're asking me.

1 Q. That's what I'm asking you, Doctor. The
2 studies that show a link between CML and Benzene
3 exposure are based on sound statistical principles,
4 correct?

5 MR. COLÓN: Objection as to form.

6 MS. FORGEY: Objection to form.

7 Mr. Robb, can we have an agreement that an
8 objection by one is good for both defendants?

9 MR. ROBB: Absolutely. I don't want our
10 court reporter to run out of the room screaming.

11 A. So I'm talking specifically about two
12 studies.

13 Q. Doctor, there's more than two studies that
14 link CML to Benzene exposure, you would agree with
15 that?

16 A. No, I don't.

17 MS. FORGEY: Objection. Form.

18 A. I don't agree with that.

19 Q. Okay. What two studies -- what are the
20 only two studies in the world, according to you, that
21 link CML to Benzene exposure?

22 MS. FORGEY: Objection. Form.

23 A. So there's one by Atigoke --

24 Q. Yes, sir.

25 A. -- which has a lot of issues.